



# TOTAL RECLAIM INC

ENVIRONMENTAL SERVICES

November 15, 2004

Ms. Cheri Peele  
P.O. Box 47600  
Olympia, WA 98504-7600

**Re: Comments on Washington State PBDE Chemical Action Plan**

Dear Ms. Peele:

I am writing to provide comment on the draft Washington State PBDE Chemical Action Plan on behalf of Total Reclaim, Inc.

I want to commend you for the considerable effort you and your staff put into researching the issues and developing these recommendations. I believe that taken as a whole, the recommendations are well crafted and will help to protect human health and the environment in Washington State.

I have the following comments on the recommendations:

- ❑ As a note of clarification, on Page vi, I am incorrectly listed as representing EcoLights under the heading Electronics Recycling. That should be changed to Total Reclaim Inc.
- ❑ The recommendations include numerous references to having DOH and L&I measure and monitor occupational exposures to PBDE fire retardants. I agree that there is a need to identify, monitor, and possibly regulate the exposure to these materials. Unfortunately, to my knowledge, and from the pages of this report, there is very little research on the actual health impacts or toxicology of exposure to PBDEs.

With no data on the risk and possible harm from exposure, how can DOH or L&I develop standards for exposure that have any basis in reality. To say it another way, just because we can measure it, does that mean it represents overexposure and needs to be regulated?

I believe that prior to developing a monitoring and testing regime, DOH, L&I, or other agencies should provide information on the risk these materials pose to humans and regulatory exposure levels.

- ❑ During the Task Force meetings it was commented that blood testing for PBDEs is expensive. Where the toxicology of materials is understood, as with lead or mercury, expensive testing may be justified, as it will protect employees from known dangers. In this case, there is no quantitative basis for evaluating occupational risk, and this requirement would likely place a significant burden on companies without a recognizable benefit.
- ❑ I support the proposed regulations to remove any and all types of PBDEs from products. At the same time, it should be recognized that if Washington bans the sale of new products containing Penta-BDE, Octa-BDE, or Deca-BDE, this represents a defacto ban on the recycling of products such as carpets, mattresses, computers, TVs, and other electronic equipment that contain these flame retardants. The only recourse will be to dispose of these materials in landfills or incinerators. This is in conflict with the current state policy to encourage recycling of these materials. If it is the intent of Ecology to require disposal of these materials, rather than recycling, this should be explicitly stated.

As I indicated in the meetings, I am very concerned about the widespread environmental contamination by PBDEs and the potential impact of these materials on workers in the electronics recycling industry. I applaud you and others at the Department of Ecology for elevating the understanding of the risks of these materials and beginning the process to control their spread in products and the environment.

If you have further questions or require additional information on the electronics recycling industry or Total Reclaim's services, please contact me at (206) 343-7443.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'S Lorch', with a stylized flourish at the end.

Craig Lorch  
Total Reclaim, Inc